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6 *Attorneys for Defendant*
7 *Nevada Gold Mines*

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JUAN ULLOA,

13 Plaintiff,

14 vs.

15 NEVADA GOLD MINES, a Delaware Limited
Liability Company,

16 Defendant.

Case No.: 3:21-cv-00495-RCJ-CSD

**STIPULATION AND ORDER TO EXTEND
DEFENDANT'S DEADLINE TO REPLY
TO DISPOSITIVE MOTION**

[First Request]

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18 Defendant NEVADA GOLD MINES ("Defendant" or "NGM"), by and through its
19 undersigned counsel of record SIMONS HALL JOHNSTON PC, and Plaintiff JUAN ULLOA,
20 ("Ulloa") by and through his undersigned counsel of record KEMP & KEMP hereby stipulate and
21 agree that, the reply deadline dispositive motion be extended to two (2) weeks from September 6,
22 2023 to **September 20, 2023**. Defendant's counsel had a pre-planned vacation, and despite his
23 best efforts, he has been unable to devote the time required to completing the Reply. The parties
24 believe a (2) week extension will enable them to complete the reply to the dispositive motion
25 without any further delay.
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This request is not made for the purpose of delay and is made in good faith.

DATED: September 1, 2023

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KEMP & KEMP

SIMONS HALL JOHNSTON PC

/s/ James P. Kemp

James P. Kemp, Esq.

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Attorneys for Defendant

ORDER

IT IS SO ORDERED.

Dated: September 5, 2023



ROBERT C. JONES
UNITED STATES DISTRICT JUDGE

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